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November 26, 2007

Honorable William H. Alsup
United States District Court
450 Golden Gate Avenue
San Francisco, CA 94102

Re: United States v. Debra Edison
CR-07-00479 WHA

Your Honor:

I am writing to respond to the Court's request that the parties agree to filing dates for motions in the above-referenced matter. I apologize for sending this letter so late in the afternoon on the Court's deadline, but I did not receive notice of the Court's November 5, 2007 Order setting today's deadline, as it appears that the Order was not entered on my client's docket, but only on Michael Edison's docket in case number CR-07-00074 WHA. My communication with the government was delayed by the fact that I have transferred to the Oakland office, so I did not receive the government's November 21, 2007 letter on this subject until today. I have now had an opportunity to speak to Mr. Finigan, as described below.

While I can agree to the schedule proposed by the government, which Mr. Finigan and I both understand would result in the Court's hearing pretrial motions at the pretrial conference on January 28, 2008 at 2:00 p.m., my strong preference is to have pretrial motions heard on January 22, 2008 on the Court's regular criminal calendar, so that the parties can have the Court's rulings on pretrial motions *prior* to filing their pretrial conference statements. This could be accomplished with a slightly shorter filing schedule – for example, the parties would file motions on December 28, 2007, oppositions would be due on January 10, 2007, and the replies would be due on January 16, 2008. I believe that this schedule is also agreeable to Mr. Finigan.

Based on the Court's November 5, 2007 Order, Mr. Finigan and I also both understand that this schedule does not supplant the schedule in Local Criminal Rule 17.1-1, by which pretrial conference statements would be due no later than four days before the pretrial conference date of January 28, 2008. Thank you for your consideration.

Very truly yours,

BARRY J. PORTMAN
Federal Public Defender
/S/

SHAWN HALBERT
Assistant Federal Public Defender

cc: Jeffrey Finigan, AUSA
Roger Patton